

### REMARKS

The Office Action dated November 29, 2006 has been received and carefully noted. The following remarks are submitted as a full and complete response thereto. Claims 1-22 are currently pending in the application and are respectfully submitted for consideration.

The Office Action rejected claims 1-22 under 35 U.S.C. §102(b) as being anticipated by Bajko (WO 02/091785). The rejection is respectfully traversed for the following reasons.

Claim 1, upon which claims 2-7 are dependent, recites a method of reassigning user data in a communications system. The user data includes a plurality of identities for each user. The method includes storing in a user information store a plurality of identities in association with a first serving controller, the plurality of identities being associated with respective registration statuses selected from a registered status and an unregistered status. The method also includes detecting that a user has requested a registration to a second serving controller using at least one of the plurality of identities, issuing a registration termination request identifying the at least one of the plurality of identities, which has been newly assigned to the second serving controller as a result of the requested registration. The method further includes, responsive to the registration termination request, i) issuing a re-registration notification to the user including the at least one of the plurality of identities which has a registered status and which was not

assigned to the second serving controller as a result of the requested registration, and ii) disassociating all identities of the said user from the first serving controller.

Claim 8, upon which claims 9-13 are dependent, recites a communications system including a first serving controller, and a user information store, which holds for a user a plurality of identities in association with the first serving controller, the plurality of identities being associated with respective registration statuses selected from a registered status and an unregistered status. The communications system also includes a second serving controller configured to transfer to the user information store a user authentication request identifying the user. The user information store is operable to detect the user authentication request and includes means for inserting into a registration termination request issued to the first serving controller each identity of that user, which was newly associated to the second serving controller as a result of the user authentication request. The first serving controller is operable, responsive to the registration termination request, to i) issue a re-registration notification to the user including each identity which has a registered status and which was not assigned to the second serving controller as a result of the user authentication request, and ii) disassociate all identities of the the user from the first serving controller.

Claim 14, upon which claims 15-17 are dependent, recites a serving controller for use in a system for providing communication between users. The serving controller includes an interface adapted to communicate with a user information store, whereby a plurality of identities, each with respective registration statuses, associate a user with the

serving controller. The serving controller is operable, responsive to a registration termination request received from the user information store, to i) issue a re-registration notification to the user including each identity which has a registered status and which incorrectly associates the user with the first serving controller, and ii) disassociate all identities of the user from the serving controller.

Claim 18, upon which claims 19-22 are dependent, recites a communications system, utilizing the reassignment of user data comprising a plurality of identities for each user. The system includes storing means for storing in a user information store a plurality of identities in association with a first serving controller, the plurality of identities being associated with respective registration statuses selected from a registered status and an unregistered status. The system further includes detecting means for detecting that a user has requested a registration to a second serving controller using at least one of said plurality of identities, and issuing means for issuing a registration termination request identifying the at least one of the plurality of identities, which has been newly assigned to the second serving controller as a result of the requested registration. The system also includes notification means for issuing a re-registration notification to the user including the at least one of the plurality of identities which has a registered status and which was not assigned to the second serving controller as a result of the requested registration, and disassociating means for disassociating all identities of the said user from the first serving controller. The notification and disassociating means are responsive to the registration termination request.

As will be discussed below, Bajko fails to disclose or suggest all of the elements of the claims, and therefore fails to provide the features discussed above.

Bajko discloses a communication system including a first control entity and a second control entity. A user is provided with at least one registration at the first control entity. The registration of the user at the first entity is transferred to the second control entity in response to another registration of the user at the second control entity. The system may include storage means for storing subscriber information and providing the control entities with subscriber information. An expiry time of a registration of the user or information associated with the status of a registration of the user may also be stored in the storage means. Any of the registrations may expire in response to the expiry of a timer.

Applicants respectfully submit that Bajko fails to disclose or suggest all of the elements of the presently pending claims. In particular, Bajko fails to disclose or suggest “responsive to the registration termination request, i) issuing a re-registration notification to the user including the at least one of the plurality of identities which has a registered status and which was not assigned to the second serving controller as a result of the requested registration, and ii) disassociating all identities of the said user from the first serving controller,” as recited in claim 1, and similarly recited in claims 8, 14, and 18.

In the response to arguments section, the Office Action states that “a request for reregistration from the second controller” as disclosed in Bajko “is very similar” to the limitation of “issuing a re-registration notification,” as recited in the current claims

(Office Action, page 11). As such, it would appear that the Office Action implicitly acknowledges that Bajko differs from the present claims in some manner. Applicants note that a “claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference” *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). Additionally, the “identical invention must be shown in as complete detail as is contained in the...claim” *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). Applicants respectfully assert that Bajko, as acknowledged by the response to arguments section of the Office Action, does not disclose each and every element as set forth in the claims. The mere fact that an element of Bajko is “very similar” to the limitations of the present claims does not render the claims anticipated by Bajko.

Furthermore, according to Bajko, the public identifier that is associated with the request is registered at the second controller entity 23 (see Bajko, Figure 3, steps 1 and 7). In other words, a particular public identifier of a user is newly registered at the second controller entity 23. The other public identifiers associated with the user are transferred to the second controller entity 23 and registered thereto (see Bajko, Figure 3, step 8). Therefore, as illustrated in Figure 3 of Bajko, the re-allocation of the other public identities of a user takes place as a result of communication between the HSS and the second S-CSCF. Bajko contains no disclosure, either explicitly or implicitly, that a re-registration notification is issued to the user including the at least one of the plurality of

identities which has a registered status and which was not assigned to the second serving controller as a result of the requested registration, and that this is done in response to the registration termination request.

Bajko discloses that the interrogating control entity (I-CSCF) selects a second control entity (S-CSCF2) rather than a first control entity (S-CSCF1) when the first control entity is not available. However, Bajko makes no mention of a registration termination request. Specifically, Bajko only discloses, as discussed above, that “the interrogating server may then request (6.) for registration from the second controller entity 23. At step (7.) the public identifier that associated with the request (1.) is registered at the second controller entity 23. Then at step (8.) other public identifiers are transferred to the second controller entity 23 and registered thereto” (Bajko, page 11, lines 26-31). Thus, Bajko clearly fails to disclose or suggest issuing a re-registration notification to the user and disassociating all identities of the said user from the first serving controller in response to the registration termination request, as recited in the present claims.

Additionally, Bajko does not disclose or suggest that the re-registration notification is issued to the user. The response to arguments section of the Office Action fails to refute this assertion.

Furthermore, the present claims recite that a registration termination request identifies the at least one of the plurality of identities which has been newly assigned to the second serving controller as a result of the requested registration. Bajko, however,

fails to disclose a registration termination request or that the at least one of the plurality of identities which has been newly assigned to the second serving controller be identified in the request. Moreover, Bajko does not disclose that, in response to the registration termination request, two things occur: the issuance of the re-registration request to the user, and the disassociation of all of the identities of the user from the first serving controller. In other words, Bajko contains no disclosure of these two actions occurring in response to the same registration termination request.

In addition, Applicants submit that Bajko also fails to disclose or suggest “an inserting unit configured to insert into a registration termination request issued to the first serving controller each identify of that user, which was newly associated to the second serving controller as a result of the user authentication request,” as recited in claim 8. In other words, according to embodiments of the invention, the second serving controller inserts into a registration termination request to the first serving controller each identity of that user. As a result, the registration termination request is effectively sent from the second serving controller to the first serving controller.

Claim 8 also recites that the first serving controller issues a re-registration notification to the user including each identity which has a registered status and which was not assigned to the second serving controller and that the first serving controller de-associates all identities of the user from the first serving controller. Bajko does not disclose or suggest these limitations of the claims. For example, Figure 3 of Bajko, which is cited by the Office Action, does not illustrate a registration termination request

being issued from the second serving controller to the first and also does not show that the that the first serving controller issues the re-registration notification to the user and de-associates all identities of the user from the first serving controller.

Therefore, for at least the reasons discussed above, Bajko fails to disclose or suggest all of the elements of claims 1, 8, 14, and 18. Consequently Applicants respectfully request that the rejection of claims 1, 8, 14, and 18 be withdrawn.

Claims 2-7, 9-13, 15-17, and 19-22 are dependent upon claims 1, 8, 14, and 18, respectively. Accordingly, claims 2-7, 9-13, 15-17, and 19-22 should be allowed for at least their dependence upon claims 1, 8, 14, and 18, and for the specific limitations recited therein.

Applicants respectfully submit that Bajko fails to disclose or suggest all of the elements of the claimed invention. These distinctions are more than sufficient to render the claimed invention unanticipated and unobvious. It is therefore respectfully requested that all of claims 1-22 be allowed, and this application passed to issue.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, the applicants' undersigned attorney at the indicated telephone number to arrange for an interview to expedite the disposition of this application.



In the event this paper is not being timely filed, the applicants respectfully petition for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,



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